INSTITUTE FOR CLINICAL PET

26741 Portola Parkway
Suite 1E-520
Foothill Ranch, CA 92610

PHONE: (714) 649-0427
FAX: (714) 649-3548
EMAIL: icpmail@aol.com
WEB ADDRESS: www.icppet.org

5661 '99 MAY 24 A10:19

May 17, 1999

Ms. Jane A. Axelrad
Associate Director for Policy
Center for Drug Evaluation and Research
Food and Drug Administraton
Rockville MD, 20857

Dear Ms. Axelrad:

Attached are the community's comments on the ANDA template for FDG. As you can see, our comments are minor and reflect overall support for this approach. Your group has done a tremendous job in organizing the information in a very logical format.

We look forward to continued success as we broach the remaining regulatory issues.

Respectfully,

Jennifer S. Keppler
Executive Director, ICP

c. J Barrio

98D-0266

C4

Recommendations for the ANDA Template

Section 1, page 2: Change "component" to "Drug Product" and "active ingredient" to "Drug Substance"

Section 2, Part A: "Critical Components" should be identified and defined. We recommend that they be O-18 and mannose triflate

Section 2, Part A, #4, page 2: In the table, change "infra-red" to "Spectroscopy (UV-VIS, IR, NMR)" and "TLC" to "Chromatography (TLC, HPLC, GC)"

Section 2, Part B, Section II, page 4: The information in the table should be provided regardless if it is an internal source or external source of F-18 production.

Section 2D (page 5) and 5A (page 7): Combine them into a single table

Section 5, page 7 and 8: Start out this section with Part B—makes more sense logistically.

Section 5, Part B, page 7. Clarify that this only needs to be filled out if cyclotron is in-house.

Section 5, part B, subpart iii, page 8, refers to "foils" –this is confusing because some people think of foils as the part that strip electrons in negative ion cyclotrons. Replace with "target windows".

Section 5, part B, subpart iii, page 9—remove reference to replacement of foils; it is not based on cycles

Section 5, part C, subpart iii, page 9 – clarify the bullit "control of the amount of reactants, reagents..." There seems to be no answer required.

Section 8, part B, page 11 –change acceptance criteria to " the radionuclide's gamma spectrum contains photopeaks at 0.511MeV and possibly at 1.022 MeV;" (add possibly)

Section 8 part B, page 12 Section on "Residual Solvents": recommend that this parameter be validated then confirmed every 10th batch.

Section 8 part B, page 12, Section on Sterility Testing: Recommend that this be done on an agreed upon schedule with FDA, not immediately after preparation

Section 10, page 13 part on Microbiological Validation, should contain reference to how many batches, etc would be required for microbiological validation

Section 8, part B page 12: Delete reference to pH as the USP does not specify pH limits

Section 8, part B page 12: Refer to manufacturer's specifications for limitation on membrane filter bubble point test

Section 8, part B page 12: Sterility testing – should enable the starting sterility tests the day after production due to radiation safety considerations